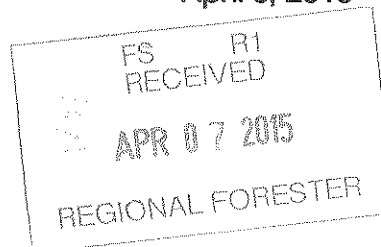


15-01-00 - 0021

852 Willoughby Lane
Stevensville, MT 59870
April 6, 2015

Objection Reviewing Officer
USDA Forest Service
Northern Region
P.O. Box 7669
Missoula, MT 59807



Dear Officer:

This is an objection to parts of the decision on the Darby Lumber Lands EA.

Objector

Kirk Thompson
852 Willoughby Lane
Stevensville, MT 59870
406-777-3145

Project

Darby Lumber Lands Watershed Improvement and Travel Management Project
Phase I

Responsible Official - Julie K. King, Forest Supervisor, Bitterroot National Forest
Darby Ranger District

Objections

1) Connector B should not be built, and road 73921 should be closed or stored. This relatively high impact route will adversely affect both watershed and wildlife values. Better alternatives are available that were not evaluated.

2) Failure to disclose impacts of large numbers of ATV's at one time, and how such numbers will be dealt with. Failure to provide means to deal with foreseeable ATV violations in the DLL. This is a NEPA violation.

Remedy - fully disclose impacts and demonstrate ability to manage large numbers of ATVs.

3) Failure to show a need for ATV loop routes. The "need" is simply asserted, with no evidence. ATV access was not part of the reasons for which the DLL were acquired. Since the Bitterroot NF travel plan has yet to be issued, there is no way to get a forest-wide perspective on this issue. There is no evidence that the DLL are the best place for ATV loop routes, even if a need is demonstrated. This is a NEPA violation.

Remedy - Delay the decision on the ATV routes until the travel plan is approved, and make an evaluation of need for ATV routes, as well as an evaluation of alternative locations for such routes.

This EA is really 2 different projects in 1 EA. There is no reason the decision on the watershed improvement project cannot proceed.

A copy of my letters to the District Ranger of 1/20/14 and 2/26/15 are enclosed. They clearly show the connection between my objection and my prior written comments.


Kirk Thompson

852 Willoughby Lane
Stevensville, MT 59870
February 26, 2015

US Forst Service
Darby , MT

Dear Mr. Oliver,

These comments are submitted for the record on the Darby Lumber Lands EA. The maps prepared for this EA were well done and easy to read.

I strongly support your proposal to decommission all roads in section 1. These roads have very serious impacts on the Sleeping Child watershed, and need to be closed to improve the watershed. Storing many of the roads in the upper Sleeping Child watershed in sections 4, 8, and 9 will also make a big improvement.

Trail 84 should be designated as non-motorized, which would make it the only trail in the area closed to motor use. It was not constructed to motor use standards, nor is it maintained for such use.

Connector B should not be built, and road 73921 should be closed or stored. This is a relatively high impact route on the watershed and on wildlife. A decision on connector I and L should be deferred until a better evaluation of impacts can be done, especially as it uses closed road 5610 and affects elk habitat and hunting opportunities. Connectors A, C, D, G, and H appear OK, and other possible connectors appear feasible, subject to concerns about future impacts described below.

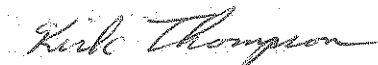
The very probable effect of developing a large system of loop ATV roads will be to greatly increase the numbers of ATVs in the area. This would result in a huge increase in impacts to soil, water, air quality and wildlife, as well as to other users. These impacts need to be evaluated and disclosed, along with a plan of how the Bitterroot NF will deal with them. In addition, violations by non-street legal vehicles and probable illegal cross-country use needs to be addressed. Increased public liability from accidents is another issue that needs to be addressed. It is very possible these impacts would warrant doing an EIS.

The EA needs to show how the ATV routes fits the reasons for which the land was acquired.

The EA does not show the mileage of roads on the Bitterroot NF that are closed to road vehicles but open to ATVs, thus distorting the picture of ATV opportunities. The EA states there is a "need " for ATV routes in the DLL, but provides no basis for this "need", nor any explanation of why such a "need" should be met on the DLL, as opposed to many other possible places on the Bitterroot NF.

The decision on the ATV roads needs to be postponed until the Bitterroot NF travel plan is approved. Until we have that decision, it is not possible to determine if ATV loop roads should be set up in the DLL, or elsewhere on the Forest.

Sincerely,



Kirk Thompson

852 Willoughby Lane
Stevensville, MT 59870
January 20, 2014

Mr. Chuck Oliver
District Ranger
Darby Ranger District
712 N Main St.
Darby, MT 59829

Dear Mr. Oliver:

These comments are being submitted for the record on the Darby Lumber Lands project as per your scoping letter.

I strongly support your proposal to decommission all roads in section 1. These roads generally have the most severe impacts, and are the least needed for other uses of all the roads being analyzed. In addition, sec 1 is in a sensitive and critical area for the integrity of the Sleeping Child watershed. This watershed will be significantly improved by eliminating these roads.

Proposed Connectors

1) Connector B should not be built. This connects to road 73921, a road at high risk to resources, to road 1392, a road which should already be R-1. The connector is on grades that are above 15%, and will be severely impacted by the mechanical erosion of ATVs. The location in the Sleeping Child drainage increases disturbances there. An alternative should be substituted in the Rye Creek drainage - possibly in the SE corner of sec 9, connecting roads 62853 and 1125. Other possibilities also exist that will reduce overall impacts.

2) Connectors Tr 104 extension and J duplicate an existing open road, appear to benefit only a small user group, and will likely result in ATV violations. They should be dropped and road 73935 stored or decommissioned.

3) The other connectors - A, C, D, G, and H - appear OK. In addition, other potential connectors exist, although they will probably require more excavation to build. Road improvements to reduce resource damage needs to be done before any connectors are built.

I propose Trail 84 be designated as non-motorized, which would make it the only trail in the area closed to motor use.

I agree with the proposal to improve aspen stands to increase diversity. In addition efforts should be made to reduce weed spread, especially the patches of houndstongue observed in sec. 15.

The probable long-term effect of developing a large system of loop roads for ATVs will be to bring increasing numbers of ATVs to the area. This would result in much larger impacts to soil erosion from road surfaces, increased impacts to other users, and much greater impacts to wildlife, especially elk. These impacts need to be estimated, evaluated, and disclosed. Some planning should be done for future enforcement, both for ATV use on roads, and the likelihood of off-road use. ATVs are advertised as vehicles to use off-roads, and studies show many ATV users do not want to be restricted to roads. Much of

the DLL area will be very inviting to off-road use.

Another issue that needs to be analyzed and disclosed is the increased risk to taxpayers from ATV accidents. Such accidents are inevitable, and when serious injury or death occurs, lawsuits follow, trying to show some responsibility on the part of the US Forest Service.

The EA needs to disclose the purposes for which the DLL were acquired, and how the proposed action fits those purposes.

Thank you for the opportunity to comment, and the very good information you have provided on this project. Please do not hesitate to call if you have any questions that I may be able to help with.

Sincerely yours,

A handwritten signature in cursive script that reads "Kirk Thompson".

Kirk Thompson